

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN THE MATTER OF:)	CASE NO 13-50463
)	
ADAM ALI AHMED)	CHAPTER 7
)	
DEBTOR)	JUDGE SHEA-STONUM
)	
CREDITOR: HSBC RETAIL SVCS)	<u>MOTION AND NOTICE</u>
)	<u>FOR REDEMPTION UNDER</u>
Address: Dept 7680)	<u>11 U.S.C. SECTION 722</u>
Carol Stream, IL 60116)	

Now comes the Debtor by and through counsel, and moves this Court pursuant to 11 U.S.C. Section 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. The item to be redeemed is a tangible personal property intended primarily for personal, family, or household use and is primarily described as follows:

2004 Yamaha YZF R-6

2. The interest of the Debtor in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditors) is a dischargeable consumer debt.

3. The allowed secured claim of said Creditor for said purposes of redemption “the redemption value,” should be determined not to be more than **\$700.00** as evidenced by that attached Schedule B on debtor petition.

4. Arrangements have been made by the Debtor to pay said Creditor up to the aforesaid amount in a lump sum should this motion be granted.

WHEREFORE, Debtors requests the Court to order the said Creditor to accept from the Debtor the lump sum payment of the redemption value and release their lien of record. In the event said Creditor objects to this Motion, the Debtor requests the Court to determine the value of the property as of the time of the hearing of such objection.

Respectfully Submitted,

Dated: June 2, 2013

/S/ TRENT A. BINGER
TRENT A. BINGER (0073995)
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P.O. Box 4
Munroe Falls, OH 44262
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(866) 498-1745 fax

NOTICE

Pursuant to LBR 9013-3 Notice is hereby given that any response or objection must be filed within twenty one (21) days, or such other time as specified by the applicable Federal Rule of Bankruptcy Procedure or statute or as the Court may order, from the date of service as set forth on the certificate of service, if relief sought is opposed, and that the Court is authorized to grant the relief requested without further notice unless a timely objection is filed.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion and Notice was electronically transmitted on or about June 2, 2013 to the following:

ECF

Patti H. Bass- representing HSBC Retail Svcs aka Capital One, N.A
Harold A Corzin- Panel Trustee
U.S.Trustee

The undersigned certifies that the foregoing was sent by regular U.S. mail, postage prepaid this June 2, 2013, to the parties and creditors listed below:

Mr. Adam Ali Ahmed
934 Saxon Ave
Akron, OH 44314

Capital One, N.A.
Bass & Associates, P.C.
3936 E Ft Lowell Rd, Ste 200
Tucson, AZ 85712

/s/ Trent A Binger
Trent A Binger 0073995